

**REMARKS**

This application has been carefully reviewed in light of the Office Action mailed January 25, 2006. Claims 1-16 and 18-24 are pending and stand rejected. Applicant respectfully requests reconsideration and favorable action of all pending claims in view of the following remarks.

**Rejections Under 35 U.S.C. § 102 and 103**

The Office Action states that Claims 1,3, 7, 9, 12, 14, 18, 20, 24 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,625,798 to Badders et al. (“*Badders*”); Claims 2, 4, 8, 10, 13, 15, 19, and 21 are rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over *Badders* in view of U.S. Patent No. 6,295,513 to Thackston (“*Thackston*”). Applicant respectfully traverses these rejections for the reasons described below.

**Claim 18**

Claim 18 is allowable at least because *Badders* does not teach or suggest “a business process attribute data set linked to the digital model data set . . . such that users of the data processing system are displayed business process attribute display elements **when a display element associated with a mechanical component defined by the digital model data set is displayed to the user**” (emphasis added) as recited in Claim 18. The Office Action cites Column 3, lines 32-37 and Column 6, lines 28-47 of *Badders* in rejecting this claim, but this portion does not disclose the claimed display of business process attributes when a mechanical component is displayed to a user. Rather, it shows attribute data can be extracted in a datasheet report format in a separate process from the display of components, as in FIG. 5A and FIG. 5B of *Badders*. In fact, in Column 4 lines 65-67, *Badders* discloses extracting the attribute data **after the user has finished drawing the CAD drawing**, but not when a display element associated with a mechanical component defined by the digital model data set is displayed to the user. Significantly, *Badders* explicitly states in Column 5, lines 58-65 that, “detailed attributes relating to the components or process lines **are not indicated** using typical CAD system drawings” and “attributes **are not specifically illustrated** on a P&ID drawing designed using typical CAD systems” where P&ID stands for Process and Instrumentation Design. Thus, the cited portion of *Badders* merely shows the attributes can be extracted in a report format, and does not teach or suggest displaying the attributes when a

display element associated with a mechanical component is displayed to the user. For at least this reason, Claim 18 is allowable as are all the claims depending therefrom. In addition, Claims 1, 3, and 12 are each allowable for analogous reasons, as are the claims depending therefrom. Favorable action is requested.

### **Claim 3**

Claim 3 is allowable also at least because *Badders* does not teach or suggest safety information defining a safety level parameter associated with a component represented in the digital model data set. Applicant's specification provides some examples of safety level parameters. Those examples include "critical," "major," and "minor." The Office Action relies on Column 2 lines 37-48 of *Badders* stating an example list of attributes for a vessel component, but this portion of *Badders* does not show a business process attribute that comprises safety information defining a safety level parameter. It cannot be disputed that the information disclosed at this portion of *Badders*, such as flange class, insulation type, operating temperature, etc. do not define safety level parameters, even if it is contended that this information relates to safety. Indeed, the definition of a safety level parameter is never mentioned in *Badders*. For at least this reason, Claim 3 is allowable as are all the claims depending therefrom. Favorable action is requested.

### **Claim 12**

Claim 12 is allowable also at least because *Badders* does not teach or suggest a knowledge base data set engine coupled to and operable to access various knowledge base data sets, the knowledge base data set engine operable to automatically **inferentially apply business process attributes to features within the digital model data set responsive to information linked to such features within the knowledge base data sets accessible to the knowledge base data set engine**. The Office Action cites Column 3, lines 45-67 in rejecting this claim, but this portion does not disclose the claimed inferential application of business process attributes. Rather, it shows a database file capable of storing relationships between equipment and attributes. As indicated in Column 4, lines 57-60, the database file is initially **blank** and the user **manually applies** attribute data based on a set of attributes. But at no point does the system of *Badders* inferentially apply attributes automatically. For at least this reason, Claim 12 is allowable as are all the claims depending therefrom. Favorable action is requested.

**Claim 1**

Claim 1 is allowable also at least at least because *Badders* does not teach or suggest quality information defining a quality level parameter associated with a component represented in the digital model data set; safety information defining a safety level parameter associated with a component represented in the digital model data set; revision information defining a revision parameter associated with a component represented in the digital model data set; and an information address attribute comprising a network address associated with information related to a component associated with data within the digital model data set.

Each of these limitations is not taught by *Badders*, and for at least this reason Claim 1 is allowable. The Office Action concedes on page 5 that *Badders* fails to teach defining a quality level attribute. The safety level parameter limitation is not taught, as described above with respect to Claim 3. Further, the cited list of example attributes relied upon in Column 2, lines 37-48 of *Badders* fails to teach a business process attribute comprising revision information or address information. Instead, the cited portion of *Badders* merely lists general attributes for vessels. Thus, each of the limitations of Claim 1 is not taught by *Badders*, and for at least this reason Claim 1 is allowable as are all the claims depending therefrom. Reconsideration and favorable action are requested.

**CONCLUSION**

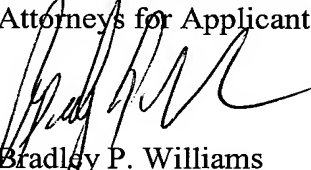
Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other apparent reasons, Applicant respectfully requests allowance of all pending claims.

If the Examiner feels that prosecution of the present Application may be advanced in any way by a telephone conference, the Examiner is invited to contact the undersigned attorney at 214-953-6447.

Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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